

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Civil Action No.
03 MDL 1570

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This document relates to:

Burnett, et al. vs. Islamic Republic of Iran, et al., Case No. 15-CV-9903 (GBD)(SN)

MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)

Pursuant to Federal Rule of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the parties identified in Exhibit A in the above-referenced action. Plaintiffs were identified as a “DOE” plaintiff at the time that this case was initially instituted, were identified as such in the initial pleadings, and have since consented to being named according to their legal name. Plaintiffs propose that, upon endorsement of Plaintiffs’ Proposed Order, the substituted parties will be individually entered as Plaintiffs into the Court’s ECF system to ease the burden on the Clerk of the Court’s Office and based on the size of this MDL.

Dated: August 15, 2024

Respectfully submitted,

MOTLEY RICE LLC

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EXHIBIT A					
#	Identification of Party to be Substituted	Residence at Filing	Reference to plaintiff in original complaint	Paragraph of Complaint Discussing Party	9/11 Decedent Name
1	David W. Bernard, Jr., individually as Child of David William Bernard, Deceased	MA	Child DOE AP63 in their own right as the Child of DOE AP63, Deceased	1:15-cv-09903, 53, at 312	David William Bernard
2	Brittany Sage Chevalier, individually as Sibling of Swede Joseph Chevalier, Deceased	NJ	Sibling DOE AP121 in their own right as the Sibling of DOE AP121, Deceased	1:15-cv-09903, 53, at 1126	Swede Joseph Chevalier
3	Elaine Chevalier, individually as Parent of Swede Joseph Chevalier, Deceased	NJ	Parent DOE AP119 as Personal Representative of the Estate of DOE AP119, Deceased and on behalf of all beneficiaries of DOE AP119	1:15-cv-09903, 53, at 1125	Swede Joseph Chevalier
4	Patrick Joseph Driscoll, individually as Parent of Stephen Patrick Driscoll, Deceased	NY	Parent DOE AP202 in their own right as the Parent of DOE AP202, Deceased	1:15-cv-09903, 53, at 867	Stephen Patrick Driscoll
5	Tylia Furgal, individually as Sibling of Swede Joseph Chevalier, Deceased	NY	Sibling DOE AP120 in their own right as the Sibling of DOE AP120, Deceased	1:15-cv-09903, 53, at 1127	Swede Joseph Chevalier
6	Denise Marie Holmes, individually as Sibling of John Anthony Sherry, Deceased	WA	Sibling DOE AP146 in their own right as the Sibling of DOE AP146, Deceased	1:15-cv-09903, 53, at 1258	John Anthony Sherry
7	Bernadette Marie McHugh, individually as Parent of Denis J. McHugh, III, Deceased	NY	Parent DOE AP72 in their own right as the Parent of DOE AP72, Deceased	1:15-cv-09903, 53, at 323	Denis J. McHugh, III
8	Bernadette Marie McHugh Torres, individually as Sibling of Denis J. McHugh, III, Deceased	NY	Sibling DOE AP70 as Personal Representative of the Estate of DOE AP70, Deceased and on behalf of all beneficiaries of DOE AP70, Deceased	1:15-cv-09903, 53, at 322	Denis J. McHugh, III
9	Ester Santillan, individually as Parent of Maria Theresa Santillan, Deceased	NJ	Parent DOE AP24 in their own right as the Parent of DOE AP24, Deceased	1:15-cv-09903, 53, at 1943	Maria Theresa Santillan

10	Expedito Santillan, individually as Parent of Maria Theresa Santillan, Deceased	NJ	Parent DOE AP23 as Personal Representative of the Estate of DOE AP23, Deceased and on behalf of all beneficiaries of DOE AP23, Deceased	1:15-cv-09903, 53, at 1942	Maria Theresa Santillan
11	Leigh McHeffey Squillante, individually as Sibling of Keith David McHeffey, Deceased	NJ	Sibling DOE AP124 in their own right as the Sibling of DOE AP124, Deceased	1:15-cv-09903, 53, at 1133	Keith David McHeffey
12	Benjamin C. Wong, individually as Parent of Jennifer Y. Wong, Deceased	NY	Parent DOE AP53 as Personal Representative of the Estate of DOE AP53, Deceased and on behalf of all beneficiaries of DOE AP53, Deceased	1:15-cv-09903, 53, at 270	Jennifer Y. Wong